



CHARLES H. CHEVALIER
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4611 Fax: (973) 639-6263
cchevalier@gibbonslaw.com

January 2, 2025

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re Selenious Acid Litigation*, No. 2:24-cv-07791 (BRM) (CLW) (Consolidated)
American Regent, Inc. v. Accord Healthcare, Inc., No. 2:24-cv-11108 (BRM)(CLW)
American Regent, Inc. v. Aspiro Pharma Ltd., No. 2:24-cv-11109 (BRM) (CLW)
American Regent, Inc. v. Cipla USA, Inc. et al., No. 2:24-cv-11112 (BRM) (CLW)
American Regent, Inc. v. Dr. Reddy's Lab's, Inc., et al., No. 2:24-cv-11114 (BRM) (CLW)
American Regent, Inc. v. Gland Pharma Ltd., No. 2:24-cv-11116 (BRM) (CLW)
American Regent, Inc. v. Hikma Pharms. USA, Inc., No. 2:24-cv-11118 (BRM) (CLW)
American Regent, Inc. v. RK Pharma Inc., No. 2:24-cv-11122 (BRM) (CLW)
American Regent, Inc. v. Somerset Therapeutics, LLC, et al., No. 2:24-cv-11124 (BRM) (CLW)
American Regent, Inc. v. Somerset Therapeutics, LLC, et al., No. 2:24-cv-11138 (BRM) (CLW)
American Regent, Inc. v. Sun Pharm. Indus. Ltd., et al., No. 2:24-cv-11126 (BRM) (CLW)
American Regent, Inc. v. Xiromed, LLC, et al., No. 2:24-cv-11130 (BRM) (CLW)
American Regent, Inc. v. Zydus Pharms. (USA) Inc., No. 2:24-cv-11133 (BRM) (CLW)**

Dear Judge Waldor:

This firm, together with Sterne, Kessler, Goldstein & Fox P.L.L.C., represents Plaintiff American Regent, Inc. ("ARI") in the above-referenced matters. With counsel for Defendants in all of the above-referenced matters, we write to submit the attached Stipulation and Proposed Order of Consolidation for the Court's consideration. If Your Honor finds the Stipulation acceptable, the parties respectfully request that Your Honor "So-Order" the document and direct its entry on the docket.

Should the Court require anything further, the parties will make themselves available at the Court's convenience. The parties thank the Court for its time and assistance in this matter.

Respectfully submitted,

s/ Charles H. Chevalier
Charles H. Chevalier

cc: All counsel of record in all of the above-referenced matters via ECF and e-mail